

# **EXHIBIT E**



**FILED**  
ALAMEDA COUNTY

MAR 25 2021

CLERK OF THE SUPERIOR COURT

By *[Signature]* Deputy

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF ALAMEDA**

Coordinated Proceeding

No. JCCP 5108

Special Title (Rule 3.550)

**NORTHERN CALIFORNIA CLERGY  
CASES**

**[PROPOSED] ORDER APPROVING  
MASTER COMPLAINT AND NOTICE OF  
ADOPTION FORMS AND REQUIRING USE  
BY ALL PLAINTIFFS**

Judge: Hon. Winifred Smith  
Coordination Trial Judge

Dept: 21

The Court, having reviewed the proposed forms for Master Complaint and Notice of Adoption of Master Complaint, hereby Orders as follows:

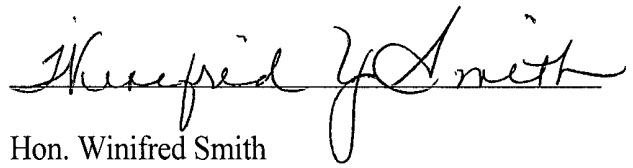
- 1- That the forms for the Master Complaint and Notice of Adoption of Master Complaint, copies of which are attached as Exhibits 1 and 2 respectively to this Order, are approved for use in this Coordination Proceeding. This approval is as to the use of the forms as a procedure, and does not represent a judicial determination or an acknowledgment by Defendants as to the viability or merits of the content, allegations, causes of action and/or remedies pleaded therein. Defendants have reserved their rights to bring challenges to the

Master Complaint and the Notices of Adoption.

- 2- That each Plaintiff in any action joined in this Coordination Proceeding as of the date of this Order shall, within 45 days of electronic service of the Order, file and electronically serve upon all Defendants who have appeared in that Plaintiff's case, a completed and signed Notice of Adoption of Master Complaint form. Said Notice and the Master Complaint shall thereafter be deemed the operative pleading in each individual case in which it is filed.
- 3- Each Plaintiff in any action added on to this Coordination Proceeding after the date of this Order shall, within 45 days of issuance of an Order Adding On that case, file and electronically serve upon all Defendants who have appeared in that Plaintiff's case, a completed and signed Notice of Adoption of Master Complaint form. Said Notice and the Master Complaint shall thereafter be deemed the operative pleading in each individual case in which it is filed.
- 4- Each Plaintiff subject to this Order shall serve the completed Notice of Adoption of Master Complaint upon any Defendant who is served or appears in that Plaintiff's case after the initial service of the Notice of Adoption.
- 5- The time periods set forth above may be extended by stipulation of the parties for a time period not to exceed 30 days. Requests or Stipulations for extensions of time in excess of thirty days shall be granted only upon approval of the Court for good cause.
- 6- This Order does not preclude any further Motions to Amend an operative Master Complaint or Adoption thereof to add a claim for Punitive Damages pursuant to C.C.P. section 425.14, or such other amendments as may be permitted by the Court based upon the stipulation of all parties to that action or further Order of the Court.
- 7- This Order does not set forth the time period for filing a response pleading by a defendant to the Master Complaint or Notice of Adoption.

1 IT IS SO ORDERED.

2 DATED: *March 25, 2021*

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4 Hon. Winifred Smith

5 Coordination Trial Judge

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